

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

Case No.: 1:23-cv-20727-RKA

**RYAN BRESLOW, et al.,**

Plaintiffs,

v.

**MARK PHILLIPS, et al.,**

Defendants.

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**MOVEMENTDAO, et al.,**

Counterclaim-Plaintiffs,

v.

**RYAN BRESLOW, et al.,**

Counterclaim-Defendants.

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**DECLARATION OF MIKHAIL RADIN**

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I, Mikhail Radin, declare as follows:

1. I am not a party in this action, am over the age of eighteen, and am competent to testify as to the matters herein. The following is based upon personal knowledge unless otherwise stated.

2. I began working as a core blockchain developer for MovementDAO around April 1, 2023 as an independent contractor.

3. I earn an annual salary of \$400,000, and I work in excess of forty hours per week for MovementDAO.

4. I am an experienced computer programmer with proficiencies in Typescript and Blockchain specific languages including Solidity,

5. I perform blockchain implementation work for MovementDAO, the underlying smart contracts, and am developing MovementDAO's application, particularly how the website interacts with the blockchain, i.e., through Typescript libraries interacting with smart contracts.

6. MovementDAO and I agreed that my compensation in 2022 would be deferred until 2023, an agreement I sought for reasons relating to my intended purchase of a home.

7. On April 13, 2023, I voluntarily returned \$238,417.67 to MovementDAO.

8. I returned these funds in a good-faith effort to comply with the Court's Order Granting the Plaintiffs' Emergency *Ex Parte* Application for Entry of Temporary Restraining Order, dated February 28, 2023, but it is my understanding that these funds are due and owing for services rendered.

9. Returning the funds has resulted in substantial personal hardship for me; in addition to essentially working without pay for the better part of both 2022 and 2023, I have had to dip into savings to pay bills and living expenses and have had to delay the purchase of a home.

10. I further anticipate that my return of the funds without subsequent payment will interfere with my ability to obtain credit for the purchase of my home.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 16, 2023

DocuSigned by:  
  
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Mikhail Radin